

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,  
Inc., Planned Parenthood Gulf Coast, Inc.,  
Planned Parenthood of Greater Texas, Inc.,  
Planned Parenthood South Texas, Inc.,  
Planned Parenthood Cameron County, Inc.,  
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

**DECLARATION OF ALFRED CURTIS**

I, Alfred Curtis, declare and state as follows:

1. I am currently employed by Planned Parenthood Gulf Coast, Inc. (“PPGC”) as Chief Operating Officer. I have held this position since September 2020, and prior to that I served as Chief Financial Officer of PPGC since December 2016. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining business records kept in the ordinary course of PPGC’s business. If called upon to testify, I could and would testify thereto.

2. I make this declaration in support of Defendants’ Opposition to Relator’s Motion to Unseal Memorandum and Appendix in Support of Motion for Summary Judgment. I understand that the Relator is attempting to unseal Plaintiffs’ brief and 13-volume, 6,295 page appendix, and

that some of the documents in Plaintiffs' appendix were designated by PPGC as "Confidential" or "Confidential Attorneys' Eyes Only" under the Protective Order entered in this matter. Unsealing these materials would substantially and materially harm PPGC and others by disclosing trade-secret level, non-public information.

3. PPGC is a healthcare provider, and competes with other healthcare organizations for medical professionals and patients in the market place. As a 501(c)(3) non-profit organization, PPGC is also reliant on securing donations and other grants to fund its mission of providing high-quality reproductive healthcare to its patients in Texas and Louisiana. In that context, PPGC is competing with similarly situated organizations to secure access to donations and grants. In addition, PPGC's mission elicits strong opposition actors who have conducted acts against PPGC that range from harassing business and mission partners to acts of violence.

4. The documents Relator is seeking to unseal were designated as "Confidential" or "Confidential Attorneys' Eyes Only Information" because they include the names and contact information of non-publicly identified PPGC employees, non-party commercial information, detailed PPGC accreditation reports, information regarding grants PPGC has received, or sensitive PPGC security information.

5. Non-Party Names and Contact Information. The documents in this category include names and contact information for PPGC non-publicly identified employees. *See* APPX.002706-APPX.002711. Our Senior Director of Security and Facilities advises employees about their exposure through open public searches and encourages them to use maximum privacy settings online. Lindsay Decl. ¶ 13, ECF No. 103-4. During my tenure with PPGC, I have become of aware of several PPGC employees who have been exposed to threats, intimidation, and/or harassment by virtue of their work for and association with PPGC. Our Senior Director of Security

and Facilities encourages employees to take protections such as parking in different locations; traveling in different routes to and from work; varying their schedule as much as possible; and not to wear their ID name badges or any work clothes or uniforms that identify them as working for PPGC while off-site. However, despite our non-publicly identified employees' best efforts to remain anonymous, they and their families have at times received death threats and harassment after their identities have become public.

6. Non-Party Commercial Information. The documents in this category contain non-party distributor commercial information, *see* APPX.005190-APPX.005193, and provider agreements with Managed Care Organizations ("MCOs") that contain confidentiality clauses, *see e.g.* APPX.002620-APPX.002670. Disclosure of this information could lead to the loss of those business partners, causing PPGC financial harm and impacting PPGC's ability to retain favorable pricing options for certain medications. Disclosure of this information may also expose PPGC's business partners to increased harassment, the risk of personal harm to the individuals identified, and the risk of litigation. Disclosure of the agreements with MCOs would be a violation of confidentiality clauses in those agreements.

7. Detailed Accreditation Reports. The documents in this category contain accreditation reports and corrective action reports for PPGC. *See* APPX.003211-APPX.003289. These reports contain detailed information about all aspects of PPGC's performance and operations, including information related to PPGC's security measures, the volume and variety of medical services PPGC provides, PPGC's detailed financial information and accounting practices, fundraising strategy, strategic and programing priorities, staffing and human resources priorities, and any corrective actions taken by PPGC. This information is highly sensitive and impacts every aspect of PPGC's operations. Disclosure of confidential security measures that PPGC has taken

could lead to physical harm or harassment of employees and patients if those security measures, once public, are circumvented. Disclosures of financial information and fundraising strategy could affect donations, causing financial harm to PPGC. Disclosures of this information could also cause financial harm to PPGC if obtained by its healthcare provider competitors and could disrupt current systems and affect PPGC's ability to provide patient care. Disclosure of certain strategic material could also harm PPGC's ability to recruit and retain medical staff for its healthcare centers, causing financial and competitive harm.

8. Financial and Grant Information. The document listed in this category contains proprietary information and propriety financial information about grants provided to PPGC. *See* APPX.004115-APPX.004117. The information contained in the documents is not information that PPGC releases to the public during the regular course of business. Disclosure of this financial information could cause PPGC financial and competitive harm if obtained by the general public or by any of PPGC's healthcare provider competitors, as it would reveal information about PPGC's revenues.

9. Sensitive Security Information. The documents in this category include information about building security measures and building plans. *See* APPX.005188-APPX.005189. Disclosures of building plans and certain security measures could cause financial harm, as PPGC buildings have previously been targets for costly vandalism and arson. PPGC has recently had a trespasser fly a drone around one of its facilities. PPGC had to engage in civil litigation to receive an order that he not trespass again. He later returned, cutting down all the bushes on one side of the building to see into the building's loading dock. These acts of trespassing and vandalism led to criminal charges. Disclosure of confidential security measures could lead to physical harm or harassment of employees and patients if those security measures, once public, are circumvented.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on February 8, 2023 in Philadelphia, Pennsylvania.

  
Alfred Curtis